

# EXHIBIT 1

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10 Attorneys for Defendant GUANGZHI CAO

11 UNITED STATES DISTRICT COURT  
12  
13 NORTHERN DISTRICT OF CALIFORNIA  
14

15 TESLA, INC., a Delaware corporation,  
16  
17 Plaintiff,  
18  
19 v.  
20  
21 GUANGZHI CAO, an individual,  
22  
23 Defendant.  
24

CASE NO. 19-cv-01463-SVK

**CERTIFICATION BY GUANGZHI CAO  
REGARDING ELECTRONIC DATA SOURCES**

**CERTIFICATION BY GUANGZHI CAO**

I, Guangzhi Cao, being over the age of 18 and duly sworn, state under penalty of perjury:

1. I am a former employee of Tesla, Inc. ("Tesla") and the defendant in the above-captioned lawsuit pending in the United States District Court for the Northern District of California, *Tesla, Inc. v. Guangzhi Cao*, No. 19-cv-01463-SVK (N.D. Cal. filed Mar. 21, 2019). I am providing this certification in an effort to cooperate with Tesla's investigation into the claims it has asserted in this case. The information set forth in this certification is based on my own personal knowledge and my best recollection of the matters discussed below.

2. Attached to this certification as **Exhibit A** is a list that sets forth (a) all of the electronic devices currently in my possession, custody, or control on which electronic files or data may be stored; (b) all of the personal email accounts currently in my possession, custody, or control; and (c) all of the personal cloud storage accounts currently in my possession, custody, or control.

3. Other than computers or other electronic storage devices owned by Tesla and that I returned to Tesla prior to the filing of the Lawsuit, the following is a list of the devices that I am able to recall as having possibly used to access, review, store, edit, or transmit any source code or other proprietary information belonging to Tesla:

- a. Cellular Phone; Apple; iPhoneX; G6WVV3N0JCLF (SN)
- b. Cellular Phone; Apple; iPhone 6 Plus; 579c-e2817a (IC); 354389060660247 (IMEI)
- c. Laptop; Apple; MacBookPro 13"; CO2PFRMZFUHS (SN)
- d. Desktop; Apple; iMac; D25PK028F859 (SN)
- e. Hard Drive; Seagate; SRD00F2 Desktop Expansion Drive 2TB; NA4MYHQZ (SN)
- f. Hard Drive; Western Digital; Elements Desktop 8TB; WMAVU3053449 (SN)
- g. Thumb drive; SanDisk; Cruzer 64gb; serial number unknown
- h. Apple iCloud account; guangzhicao (user name) and/or guangzhicao@gmail.com (email)
- i. Google Drive; guangzhicao (username)

4. Other than computers or other electronic storage devices owned by Tesla and that I returned to Tesla prior to the filing of the Lawsuit, the following is a list of the devices that I am able to recall as having possibly used to access my iCloud account since April 23, 2017:

- a. Cellular Phone; Apple; iPhoneX; G6WVV3N0JCLF (SN)
- b. Cellular Phone; Apple; iPhone 6 Plus; 579c-e2817a (IC); 354389060660247 (IMEI)
- c. Laptop; Apple; MacBookPro; CO2PFRMZFUHS (SN)
- d. Desktop; Apple; iMac; D25PK028F859 (SN)
- e. Tablet; Apple; iPad Pro; DMPTC6GZHMD (SN)
- f. Watch; Apple; AppleWatch 4; g99xtawakdh3 (SN)
- g. Watch; Apple; AppleWatch 2; serial number unknown
- h. TV Top Set; Apple; AppleTV3 Box; DY4QD85RG9RM (SN)
- i. TV Top Set; Apple; AppleTV2 Box; C7RG9AAGDDR5 (SN)

5. Of the electronic storage devices identified in Paragraphs 3 and 4 above, the only electronic storage device that is not currently in my possession, custody, or control entirely is the following thumb drive: SanDisk; Cruzer 64 gb; serial number unknown ("SanDisk USB"). The reason that the SanDisk USB is no longer in my possession, custody, or control is that I physically destroyed this device around the time of my separation employment from Tesla. The reason why I destroyed this device is that I thought I had transferred Tesla source code, and possibly other Tesla information, onto it, and I understood that I should not retain a copy of a repository of Tesla's source code after I left the company. No other person currently has possession, custody, access, or control of any of the electronically stored contents of the SanDisk USB because the device was destroyed.

6. I certify, under penalty of perjury of the laws of the United States, that the foregoing statements are true and correct, to the best of my knowledge and recollection.

DATE: April 5, 2019



GUANGZHI CAO



**EXHIBIT A****Personal Electronic Storage Devices:**

1. Cellular Phone; Apple; iPhoneX; G6WVV3N0JCLF (SN)
2. Laptop; Apple; MacBookPro; CO2PFRMZFUHS (SN)
3. Desktop; Apple; iMac; D25PK028F859 (SN)
4. Hard Drive; Seagate; SRD00F2 Desktop Expansion Drive 2TB; NA4MYHQZ (SN)
5. Hard Drive; Western Digital; Elements Desktop 8TB; WMAVU3053449 (SN)
6. Tablet; Apple; iPad; DMPTC6GZHMD (SN)
7. Cellular Phone; Apple; iPhone 7; dx3y405ghg6y (SN)
8. Cellular Phone; Apple; iPhone 6 Plus; 579c-e2817a (IC); 354389060660247 (IMEI);  
bcg-e2871a (FCC ID)
9. Watch; Apple; AppleWatch Series 4; g99xtawakdh3 (SN)
10. Hard Drive; Cexco; Model No. 2526; serial number unknown
11. Hard Drive; manufacturer unknown; model & serial number unknown
12. Watch; Apple; AppleWatch 2; serial number unknown
13. Memory Card; Transcend; HC 4gb; MMBGF04gwaca-ge (SN)
14. Memory Card; SanDisk; HC 16g; 7352zr4yp278 (SN)
15. Memory Card; manufacturer unknown; 4gb; hsp04na2sm (SN)
16. TV Top Set; Apple; AppleTV3 Box; DY4QD85RG9RM (SN)
17. TV Top Set; Apple; AppleTV2 Box; C7RG9AAGDDR5 (SN)
18. TV Top Set; Roku; Roku3 Box; 1GS43C044296 (SN)
19. TV Top Set; Xiaomi; Mi Box mdz-06-as; 248215024666 (SN)
20. Gaming Console; Nintendo; Switch; XAW10088129630 (SN)
21. Gaming Console; Nintendo; Wii RVL-001; LU92313157 (SN)
22. Smart Speaker; Google; Home Mini; 8224L4QZFY (SN)
23. E-Reader; Kindle; Paperwhite; b024 1503 2523 0557 (SN)
24. TV stick; Google; Chromecast; 7323103OXBYQ (SN)

25. Assorted CD/DVDs; manufacturer(s) unknown; model(s) & serial number(s) unknown

- “Growing Tree Learning Center Summer Camp Week 8”
- “Only For Love”
- “The Center for Prenatal Care”
- “Portrait Session CD 6-25-16”
- “Engl001 - Guangzhi Cao”
- “Love”
- “Daughter ultrasound - Meriter”
- “永远的浙江大学电气工程学院2002硕4班”
- “SOHOT - imation”
- “婚礼 Video”

**Personal Email Accounts:**

- 26. Gmail, username guangzhicao@gmail.com
- 27. Apple iCloud, username guangzhicao@icloud.com
- 28. Hotmail, username guangzhicao@hotmail.com

**Personal Cloud Storage Accounts:**

- 29. Apple iCloud account, username guangzhicao@gmail.com or guangzhicao
- 30. Google Drive account, username guangzhicao

**Additional Personal Storage Devices of Family Members:**

- 31. Laptop; Apple; MacBook 15”; C02X35FGJG5L (SN)
- 32. Cellular Phone; Apple; iPhoneX; g6tvwgrvjclg (SN)
- 33. Cellular Phone; Apple; iPhone 6s Plus; 579c-e2944a (IC); bcg-e2944a (FCC ID)
- 34. Watch; Apple; AppleWatch 2; FHL SX5LDHDX7 (SN)
- 35. Cellular Phone; Apple; iPhone6; 352062060741968 (IMEI); 579c-e2817a (IC);  
bcg-e2817a (FCC ID)

36. Tablet; Apple; iPad 2; dmvjvv93f185 (SN)